

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL INSURANCE COMPANY, et al.,

Plaintiffs,

-against-

HARVEY WEINSTEIN,

Defendant.

1:18-cv-02526-PAC (RWLx)

**DECLARATION OF MARY E. FLYNN  
IN SUPPORT OF MOTION TO  
WITHDRAW**

HARVEY WEINSTEIN,

Counterclaimant,

-against-

FEDERAL INSURANCE COMPANY, CHUBB  
INDEMNITY INSURANCE COMPANY,  
VIGILANT INSURANCE COMPANY,  
PACIFIC INDEMNITY INSURANCE  
COMPANY GREAT NORTHERN INSURANCE  
COMPANY, and DOES 1-10, inclusive,

Counter-Defendants.

HARVEY WEINSTEIN,

Third-Party Plaintiff,

-against-

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA, CHUBB  
INSURANCE COMPANY OF EUROPE S.A.,  
and ROES 2-10, inclusive,

Third-Party Defendants.

MARY E. FLYNN, an attorney duly admitted to practice law before this Court,  
declares the following under penalty of perjury:

1. I am a member of the law firm of Morrison Cohen LLP (“MoCo”), attorneys for Defendant Harvey Weinstein (“Defendant”). I make this Declaration based on my own personal knowledge, pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York (the “Local Rules”) and in support of MoCo’s Motion to Withdraw as Counsel for Defendant.

2. Defendant engaged MoCo to represent him in this action and in related actions on or about December 14, 2017.

3. I seek leave for MoCo to withdraw as counsel due to a disagreement concerning the Firm’s invoices to Defendant and the Defendant’s stated intention to consolidate his representation in various actions pending in this District.

4. I have spoken with Defendant and Defendant’s other legal counsel. Defendant consents to MoCo’s withdrawal as his counsel in this matter and in all related matters in which MoCo appeared on his behalf.

5. MoCo’s withdrawal will have no dilatory effect on this action. Defendant is already represented in this action by the law firm of Abelson Herron Halpern LLP, of which Michael Abelson, Esq. (admitted *pro hac vice*) serves as lead counsel. Hence, there will be no disruption to the schedule in this case by reason of the Firm’s withdrawal.

6. Accordingly, I respectfully request that the Court grant MoCo’s motion to withdraw immediately.

**WHEREFORE**, for all the foregoing reasons, Morrison Cohen LLP respectfully requests that, pursuant to Local Rule 1.4, the Court grant its Motion to Withdraw as Counsel for Defendant.

Dated: New York, New York  
October 10, 2018

  
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MARY E. FLYNN